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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,  
11 Plaintiff,  
12 v.  
13 JONATHAN CORTEZ-RAMIREZ,  
14 Defendant.  
15

Case No. 2:22-cr-00201-GMN-NJK

**STIPULATION TO CONTINUE  
REVOCATION HEARING**  
(First Request)

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17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,  
18 United States Attorney, and David C. Kiebler, Assistant United States Attorney, counsel for the  
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Joy Chen,  
20 Assistant Federal Public Defender, counsel for Jonathan Cortez-Ramirez, that the Revocation  
21 Hearing currently scheduled on May 30, 2024, be vacated and continued to a date and time  
22 convenient to the Court, but no sooner than sixty (60) days.

23 This Stipulation is entered into for the following reasons:

- 24 1. The parties are working towards a resolution of this matter that could obviate  
25 the need for an evidentiary hearing, and require additional time for negotiations.  
26 2. Defense counsel requires additional time to review discovery, conduct  
investigation, and counsel the defendant on his legal options.

1           3.       The defendant is in custody and agrees with the need for the continuance.

2           4.       The parties agree to the continuance.

3           This is the first request for a continuance of the revocation hearing.

4           DATED this 24th day of May, 2024.

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6           RENE L. VALLADARES  
7           Federal Public Defender

            JASON M. FRIERSON  
            United States Attorney

8           By /s/ Joy Chen

9           JOY CHEN  
10          Assistant Federal Public Defender

            By /s/ David C. Kiebler

            DAVID C. KIEBLER  
            Assistant United States Attorney

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,  
4 Plaintiff,  
5 v.  
6 JONATHAN CORTEZ-RAMIREZ,  
7 Defendant.  
8

Case No. 2:22-cr-00201-GMN-NJK

**ORDER**

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10 IT IS THEREFORE ORDERED that the revocation hearing currently scheduled for  
11 Thursday, May 30, 2024 at 10:00 a.m., be vacated and continued to August 13, 2024 at  
12 the hour of 10:00 a.m.

13 DATED this 28 day of May, 2024.

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16 UNITED STATES DISTRICT JUDGE  
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